

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-11

JUN 0 5 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ANGLIN COMPANIES, INC. 1402 W. MAIN FORT WAYNE, IN 46808

Re: Wayne Reclamation and Recycling ("Site") Columbia City, Indiana

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants and contaminants at the above referenced Site. A Remedial Investigation/Feasibility Study (RI/FS) of the Site has been completed. This action was undertaken pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. Section 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Public Law 99-499 (CERCIA).

In accordance with the requirements of Section 104(b) of CERCIA, the Remedial Investigation (RI) Report describes findings on the nature and extent of contamination at the Site. The Feasibility Study (FS) Report considered alternatives necessary to address the conditions at the Site. Along with the FS Report, U.S. EPA issued a Proposed Plan for a thirty day public comment period which ended February 21, 1990. On March 30, 1990, the Regional Administrator issued a Record of Decision (ROD) selecting the remedial action which was originally proposed (See Attachment III) for the Site.

Unless the U.S. EPA determines that a potentially responsible party (PRP) will voluntarily undertake the remedial action necessary at the Site, U.S. EPA may, under Section 104 of CERCIA, undertake the remedial action itself and, under Section 107 of CERCIA, seek reimbursement from PRPs of all response costs incurred in connection with the action taken. Such costs may include, but are not limited to, expenditures for investigation, planning, response and enforcement activities.

Moreover, under Section 106 of CERCIA, U.S. EPA may order responsible parties to implement relief actions deemed necessary by U.S. EPA to protect the public health, welfare or environment from an imminent and substantial

endangerment because of an actual or threatened release of a hazardous substance from a facility.

Responsible parties under Section 107 of CERCIA include current owners and operators of the Site, former owners and operators of the Site at the time of disposal of hazardous substances, as well as persons who owned or possessed hazardous substances and arranged for disposal, treatment, or transportation of such hazardous substances, and persons who accepted hazardous substances for transportation for disposal or treatment to a facility selected by such transporter. U.S. EPA has information indicating that you are a PRP with respect to the Wayne Reclamation and Recycling site. The sources of this information are briefly summarized in Paragraph A of Attachment I to this letter. By this letter, U.S. EPA notifies you of your potential liability with regard to this matter and encourages you, as a potentially responsible party, to reimburse U.S. EPA for the costs incurred to date and to voluntarily perform or finance the response activities that U.S. EPA has determined or will determine are required at the Site.

In accordance with CERCIA and other authorities, U.S. EPA has already undertaken certain actions and incurred certain costs in response to conditions at the Site. These response actions are summarized in Paragraph B of Attachment I to this letter. The approximate cost to date of the response actions performed through U.S. EPA funding at the Site is set forth in Paragraph C of Attachment I. The Agency anticipates expending additional funds for response activities at the Site under the authority of CERCIA and other laws. In accordance with Section 107(a) of CERCIA, demand is hereby made for payment of the amount specified in Paragraph C of Attachment I plus any and all interest authorized to be recovered under Section 107(a) or under any other provision of law. Demand is also hereby made under these authorities for payment of interest on all future costs that U.S. EPA may incur in regard to the Site.

U.S. EPA is currently planning to conduct the following additional response activities at the Site:

- Design and implementation of the remedial action selected and approved by U.S. EPA for the Site; and
- Provision of any monitoring, operation and maintenance necessary at the Site after the remedial action is completed.

In addition, U.S. EPA may, pursuant to its authorities under CERCIA and other laws, decide that other clean-up activities are necessary to protect public health, welfare and the environment.

If you are already involved in discussions with state or local authorities, engaged in voluntary clean-up action or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise you or direct you to restrict or discontinue any such activities; however, you are advised to inform U.S.

EPA of the status of those discussions or actions in a response to this letter and to provide a copy of this response to any other parties involved in those discussions or actions. Your response letter should be sent to:

Tinka G. Hyde, 5HS-11 U.S. Environmental Protection Agency 230 South Dearborn Street Chicago, Illinois 60604

Pursuant to Section 122(e)(1) of CERCIA, the U.S. EPA has determined that a period of negotiation may facilitate an agreement with you and other PRPs. Upon initiation of the negotiations moratorium period, you will have a maximum of 60 days to coordinate with any PRPs and to present to U.S. EPA a "good faith" proposal for implementing and conducting the remedial action recommended in the Proposed Plan. To assist the PRPs in negotiating with U.S. EPA concerning this matter, U.S. EPA is providing a list of all other PRPs to whom this notification is being sent and the names and addresses of the RI/FS PRP Steering Committee. This list is appended as Attachment II to this letter. It should be noted that inclusion on or exclusion from the list does not constitute a final determination by the Agency concerning the liability of any party for remediation of Site conditions or payment of past costs. Information regarding a ranking by volume and nature of substances contributed by each PRP, as contemplated by Section 122(e)(4)(A), has previously been provided to the steering committee.

In accordance with the requirements of Section 122(e)(2), during the 60 day calendar period, beginning June 28, 1990, the U.S. EPA will not commence remedial action at the Site. U.S. EPA may, however, commence any additional studies or investigations authorized under Section 104(b), including remedial design, during this negotiation period. If U.S. EPA receives from the PRPs within the 60 day calendar period a written "good faith offer" which demonstrates the PRP's qualifications and willingness to conduct and/or finance the remedial design and remedial action (RD/RA) consistent with U.S. EPA's Proposed Plan, U.S. EPA will extend its moratorium on commencement of the remedial action work an additional 60 calendar days. The Proposed Plan, which recommended the remedy that was chosen by the Regional Administrator in the ROD, is appended as Attachment III.

The purpose of the additional time is to allow the PRPs and the U.S. EPA a period of time to finalize the settlement. A "good faith offer" for RD/RA should include the following:

- a statement of the PRPs' willingness to conduct and/or finance the RD/RA which is generally consistent with U.S. EPA's Proposed Plan or which provides a sufficient basis for further negotiations in light of U.S. EPA's Proposed Plan;
- a detailed "statement of work" or "workplan" identifying how PRPs plan to proceed with the work;

- a demonstration of the PRPs' technical capability to undertake the RD/RA. This should include a requirement that PRPs identify the firm they expect will conduct the work or that PRPs identify the process they will undertake to select a firm.;
- a demonstration of the PRPs' capability to finance the RD/RA;
- a statement of the PRPs' willingness to reimburse U.S. EPA for past response and oversight costs; and
- the name, address, and phone number of the party or steering committee who will represent the PRPs in negotiations.

Except in extraordinary circumstances explained in a written request, no extension to this 60 day period will be granted by the U.S. EPA. If a "good faith" proposal is not received within 60 calendar days, the U.S. EPA, pursuant to section 122(e)(4), may proceed to undertake such further action as is authorized by law, including implementation of the remedial action utilizing public funds available to the Agency.

To further facilitate your and any other PRPs' ability to present a "good faith" proposal within the 60 day time limit, the Agency has set up a meeting to provide information that will assist the PRPs in that effort. Toward that end, a draft Consent Decree and Statement of Work (SOW) will be provided to those persons attending this meeting. The details for the meeting are as follows:

Thursday, June 28, 1990 10:30 a.m. Fort Wayne, Indiana Holiday Inn, Grand Ballroom 300 E. Washington Blvd. (219) 422-5511

Additionally, the draft Consent Decree was provided to the State of Indiana. These revisions will be forwarded to the PRPs as they become available. Please note that the draft consent decree and scope of work, though already partly tailored for the purpose of exploring settlement possibilities with you at this particular site, are subject to changes based on the current, ongoing review of these documents by the Department of Justice.

An Administrative Record containing documents that form the basis for the Agency's decision on the selection of the remedy is available for public inspection at U.S. EPA - Region V office in Chicago, Illinois or at the information repositories located at the Columbia City Hall and Peabody Library in Columbia City, Indiana.

If you need further information regarding this letter, you may contact

Tinka Hyde of the Remedial and Enforcement Response Branch at (312) 886-9296. If you have an attorney handling your legal matters, please direct his or her questions to Elizabeth Doyle of the Office of Regional Counsel, U.S. EPA, Region V, at (312) 886-7951.

By a copy of this letter, the U.S. EPA is notifying the State of Indiana and the Natural Resources Trustees, in accordance with Section 122(j) of CERCIA, of its intent to enter into negotiations concerning the implementation of remedial action at the Site, and is also encouraging them to consider participation in such negotiations.

If you have not already done so, the U.S. EPA strongly encourages you to take immediate steps to organize into a Committee to negotiate an agreement with U.S. EPA to undertake the remedial actions at the Site. We hope that you will give this matter your immediate attention.

Sincerely yours,

John Kelley, Acting Chief

Remedial and Enforcement Response Branch

Enclosures

cc: Sheila Huff, DOI
Doug Fisher, IDEM
Tom Mariani, DOJ
Patrick Ralsdon, IDNR
Environmental Defense Section, DOJ
Indiana Attorney General
Dan Sparks, USFW

ATTACHMENT I

- A. U.S. EPA has evaluated a body of evidence in connection with its investigation of the Site, specifically, State of Indiana, SPC-17 Liquid Waste Removal Record Hauler Reports pertaining to the Site. Based on this evidence, U.S. EPA has information indicating that you are a potentially responsible party with respect to this Site.
- B. The current PRP Group has conducted the following studies and/or activities at the Site.
 - 1. 1986 Removal Action removed and disposed of contaminated soil, disposal of contents of 215-55 gallon drums and backfill of excavated areas.
 - 2. Remedial Investigation to determine the nature and extent of contamination at the Site.
 - 1988 Removal Action conducted by a group of 5 PRPs, removed and disposed of additional contaminated soil and drums, disposal of 23 horizontal tank contents, and fencing.
 - Feasibility Study to evaluate the feasibility of possible alternatives to remediate the Site contamination identified during the Remedial Investigation.
 - 5. U.S. EPA released it's Proposed Plan for the site remediation on January 22, 1990.
 - 6. U.S. EPA issued it's Record of Decision for the WRR site remediation on March 30, 1990.
- C. Past Costs: As of October 17, 1989, \$622,066.58 have been expended by U.S. EPA at this Site. The PRPs have been billed for oversight costs and to date have paid \$56,588.02 towards their bills. Therefore, past costs incurred by the U.S. EPA as of October 17, 1989 are \$565,478.56. Following that date, U.S. EPA has incurred, and will incur, additional response costs regarding the WRR site.

ATTACHMENT II

The names and addresses of all parties receiving a copy of this letter are attached.

CURRENT WRR PRP GROUP STEERING COMMITTEE

William N. Hall Breed, Abbott & Morgan 1875 Eye Street, N.W. Washington, D.C. 20006 (202)466-1118

Christopher J. Dunsky Honigman Miller Schwartz and Cohn 2290 First National Building Detroit, Michigan 48226 (313) 256-7872

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AUBURN, IN_46706-2133

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JOHN BARCOT
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FORT WAYNE, IN_46803

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BLUPPTON POWER PLANT
514 E. WASHINGTON
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CHARLES V. CHAFFEE, PRESIDENT
BLUFFTON RUBBER CO., INC.
P.O. BOX 255
BLUFFTON, IN_46714

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CHARLES R. CAMPBELL
PLANT ENGINEER, BRODERICK 'CO.
500 LINCOLN STREET
DIVISION OF HARSCO CORPORATION
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BUNGE CORP. OF INDIANA
HIGHWAY 25
P.O. BOX 180
LOGANSPORT, IN_45947-0188

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67 900116
CITY REGIMERS'S OFFICE
WATER POLLUTION CONTROL
CITY HALL
FORT WATER, IM_46803

88 900116 CHI WABASH CAST, INC. P.O. BOX 668 WABASH, IN_46992 96 900116
TINDTHY J. BLOOM
CITY OF COLUMBIA CITY, CITY HALL
CHAUGERY STREET
COLUMBIA CITY, IN_46725

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J. HICHAEL O'NARA, ESQ.
P.O. BOR 2263
BARRETT, BARRETT & HCHAGHT
FORT WAYNE, IN_46801

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ELKHART, IN_46515

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FORT WAYNE, IN_W6825

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RAYMOND C. HARTER
DIVISION COUNSEL
CORNENS SLASS WORKS
LEGAL DEPARTMENT
CORNENS, NY_14831

99 900116
CUSTARD INSURANCE ADJUSTERS, INC.
P.O. BOX 10479

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JOHN CANAN
VICE PRESIDENT, PRGINPFRING

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DAYCO CORPORATION
1200 W. HICHIGAN AVENUE
THREE RIVERS, HI_49093

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U.3. HIGHWAY 6 WEST
SUTLER, IM_46721

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DOUGLASS CONSTRUCTION CO., INC.
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FORT WAYNE, IN_46815

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EDGERTON, ON_43517

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HILES C. GERBERING
BARRETT, BARRETT & HCHAGHY
P.O. BOX 2263
ELECTRIC HOTORS & SPECIALTIES INC
FORT WATHE, IN_46801

123 900116
ELHHURST BUS GARAGE
FORT WATHE SCHOOL DISTRICT
6006 ARDHORE AVENUE
FORT WAYNE, IN 46809

P.O. BOX 1368
DALTON POUNDRIES, INC.
WARSAW, IN 46580

103 907116
LARRY L. TUCKER
DAYTON-WALTHER CORPORATION
600 EAST HIGHLAND AVENUE
NUNCIE DIVISION
NUNCIE, IN 47303

106 900116 STEVEN L. ARTUSI, ESQ. CORPORATE COUNSEL DE PUT P.O. SOI 966 WARSAW, IN_46580

109 900116
DOTCO COPPER AIR TOOLS
4030 STATE ROUTE 16
BICKSVILLE, ON_43526

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115 900116
ROBERT E. BRYDEN
ASSOCIATE COUNSEL, E-SYSTEMS INC.
P.O. DOX 660248
DALLAS,TE_75266

110 900116
RDOM MACHINE DIVISION
SIMPSON INDUSTRIES, INC.
W. INDIANA
EDOM, ON_43516

121 900116
BLEWART PRODUCTS CORP.
700 RAINBOW ROAD
GEMETA, IM_46740

124 900116 EPCO PRODUCTS P.O. BOX 387 WEW HAVEN, IN 46774 905 MORTH WEST HOULEVARD BLKHART, IN_46514

101 900116 CLEMENT A. REVETTI LEGAL COUNSEL P.O. BOX 1000 DAMA CORPORATION TOLEDO, OH 43697

134 900116
DEKALB CENTRAL SCHOOL DISTRICT
P.O. BOK 503
AUBURN, [N_46705

107 900116 MM. A. DIDIER S SONS 613 HIGH STREET P.O. BOX 1074A FORT WAYNE, IN_46853-0748

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AR. MORBERT P. STROREL

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113 900116
DYNAMIC POWER CORPORATION
RURAL ROUTE 2
P.O. BOE 140
OSSIAN, IN_46777

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RATHRYN L. GOETZ, ATTOHNEY
BAGLE-PICHER INDUSTRIES, INC.
P.O. BOX 779
CINCINNATTI, OH_45201

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ELCO INDUSTRIES, INC.
P.O. BOX 606
LOGANSPORT, IN_46947

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PLEX STEEL HUDDSTRIES, INC.
P.D. BOX 129
HEN PARIS, IN_46553

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ROY S. HOWAROUSEI
FRANKLIN ELECTRIC COMPANY, INC.
400 EAST SPRING STREET
BLUFFTON, IN_46714

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138 900116
THOMAS M. ARMSTRONG
COUNSEL-ENVIRONMENTAL ISSUES
GENERAL BLECTRIC COMPANY
PAIRFIELD, CT_06431

141 900116
DAVID C. LEE
STATE GENERAL COUNSEL & SEC.
P.O. BOX 407
GENERAL TELEPHONE COMPANY
WESTPIELD, IN_46704

144 900116
JOHN ROSS
VICE PRESIDENT - E.P.A.
111 EAST BROAD STREET
GRIPCO PASTENERS DIVISION OF HITE
SOUTH VHITELT, IN_46707

147 900116
RENDRICKSON TANDEN CORP.
BOLER INVESTMENTS, INC.
P.O. BOX 927
KENDALLVILLE, IN_46755

150 900116 HOOK IND. SALES 2731 BROOKLYN AVENUE PORT WAYNE, IN_46804 LAUREN H. HORISZNT CORPORATE COUNSEL 2855 COOLIDGE EI-CELL-O CORP. TROT, HI_48084

130 900116
FORT WAYNE AIR SERVICE
(RA) JOHN DILLEY
4021 AIR ST. BARRPIELD
FORT WAYNE, IN_46609

133 900116
FREEHOUT MPG.
DIVISION OF SIMPSON IND. INC.
5. TILLOTSON
FREHONT, IN_46737

136 900116
GASOLINE EQUIPMENT SRV. CO., INC.
P.O. BOX 10474
FORT WAYNE, IN_46852

139 900116
D. W. HOHRHAM
HANAGER-ENVIRONMENTAL PROGRAMS
P.O. BOX 2230
GENERAL ELECTRIC COMPANT
FORT WAYNE, IN_46801

142 900116
GRHEVA SCREW MACHINE PRODUCTS INC
U.S. 27 N.
P.O. BOX 241
ROUTE 1
GRHEVA,IM_46740

145 900116
HAGERMAN CONSTRUCTION CORP.
501 W. WASHINGTON BOULEVARD
FORT WAYNE, IN_46802

148 900116 HILLSDALE TOOL 6 HPG. CO. 135 E. SOUTH HILLSDALE, HI_49242

151 900116 NOOVER DRAINAGE GRINN ROAD NUNTINGTON, IN_46750 ESSEX INTERNATIONAL, INT.
UNITED PECHNOLOGY CORPORATION
UNITED TECHNOLOGY BUILDING
HARTPORD, CT_06101

128 900116 PLATLOW, INC. 1610 CIRCLE SOUTH BEND, IN_46628

131 900116
FORE WATHE WATER
POLLUTION CONTROL PLANT
2601 DWENGER AVENUE
FORE WATHE, IN_46803

- 134 900116 G-G SERVICE CO. GLENBROOK SQUARE SHOPPING CENTER FORT WATHE, IN_

137 900116
GATES CHEVROLET CORP.
401 5. LAPAYETTE
SOUTH BEND, IN_46601

900116
GENERAL PETROLEUN, INC.
3919 HOBILE
PORT WATHE, IN_46805

143 900116 GENDYA, INC. 7034 E. COURT DAVISON, HI_48423

146 900116
TOM HARGETT
FRUENAUF CORP.
LIQUID AND BULK TANK DIVISION
P.O. HOL 660
PORT WANK, IN_4601

149 900116'
HOLHES AND COMPANY
807 EAST ELLSWORTH
P.O. BOX 370
COLUMBIA CITY, IN_46725

153 900116 ITT AEROSPACE/OPTICAL DIVISION DIVISION OF LTT CORP. P.O. BOI 3700 PORT WAYNE, IM_46801-3701

154 900116 INCO, INC. P.O. BOX 444 MUNTINGTON, IN_46750

156 900116 INDIANA DIE NOLDING DIVISION OF HARNET INDUSTRIES INC 9100 PRONT STREET FORT WATHE, IN_46818-2209

157 900116 1702 S. PAIRFIELD AVENUE PORT WAYNE, IN_46804

INDUSTRIAL PUEL OILS, INC.

900116 JAMESON CORP. OF INDIANA 209 W. ONIO STREET P.O. BOX 247 KENDALLVILLE, IN_46755-2015

160 900116 JIM EELLY BUICK, INC. 1819 S. CALHOUN PORT WATHE, IN_45804

900116 JOSAN MANUPACTURING COMPANY 1506 EAST SECOND STREET HICHIGAN, IN_46360

163 900116 JOY HANDPACTURING COMPANY 301 GRANT STREET PITTSBURGH, PA_15219

900116 165 RREAGER BROTHERS EXCAVATING RURAL ROUTE 1 CROMUELL, TU_46732

900116 166 ECOUTZ EQUIPMENT 6946 LILAC ROAD PLINOUTH, IN_46563

168 900116 RERR GLASS HAUDPACTURING CORP. 524 EAST CENTER DUNKIRK, IN_47336

900116 169 LARDEN CORP. REMER R. HAWHIMMRY 11 S. MERIDIAN ST. SUIPE 1313 BARNES AND THORNSURG INDIANAPOLIS, IN_46204

171 900116 (RA) SENE LOPSMIRE 401 W. PAIRPAX FORT WATER, IN_46607

172 900116 LINE CITY MPG. CO., INC. 1470 BIRR AVENUE P.O. BOX 509 NUMTINGTON, IN_46750-3640

900116 LINCOLN NAMUPACTURING COMPANY INC P.O. BOX 1229 FORT WATER, IN_46801

175 900116 LOBDELL-ENERY MFG. CO. 10850 17TH STREET ARGOS, IN_46501-9703

177 900116 LYDELL, INC., ELASTOMER PRODUCTS GROUP P.O. BOX 29

178 900116 ZANKK, INC. 100 PROGRESS WAY W. AVILLA, IN_46710

152 900116 THOMAS L. ALDRICH ASSISTANT GENERAL COUNSEL 2703 SANDERS ROAD HOUSEHOLD MANUFACTURING, INC. PROSPECT MEIGHTS, IL_60070.

900116 155 INDIANA AIR NATIONAL GUARD BAER FIELD PORT WATNE, IN_46809

900116 THERNATIONAL HARVESTER COMPANY 2701 COLISEUM BOULEVARD P.O. BOX 596 PORT WATHE, IN 46801

161 900116 JOHNSON PRODUCTS 2100 STRRLING AVENUE ELKHART, IN_46516

164 900116 K. MART DISTRIBUTION CENTER P.O. BOX 359 ICBOP_NI,SMYAW TROT

167 900116 KITCHEN QUEP, ENC. WILLIAN L. SWEET, JR. P.O. BOX 2263 BARRETT, BARRETT S HCHAGNY FORT WATNE, IN_46801

170 900116 RUPUS H. CRAIG, DIRECTOR OF LAW MACHELLAN BLOEDAL, INC. P.O. BOK 366 PINE HILL, AL_36/69

907116 LIMESTONE PRODUCTS, INC. P.O. BOK 618 PORTLAND, IN_47371

900116 LOCK JOINT TUN COMPANY, INC. 1400 RIVERSIDE DRIVE P.O. JOK 239 South Burnel, TNI 466261

GERBER STREET LIGONIER, IN_46767-0491

900116 180 THOMAS H. HAPHER, ESQ. MAGNAVOI CONSUSHER ELECTRIC CO. P.O. BOX 14810 NORTH AMERICAN PHILIPS COMPANY KNOXVILLE, TH_37914

183 900116 HARTIN OIL **4501 127TH ALSIP** BLUE ISLAND, IL_60406

186 900116 HCCORD HEAT TRANSFER CORP. 500 W. MARRISON STREET PLYHOUTH, IN_46563-1324

169 900116 MEANS SERVICE, INC. (RA) CT CORP. 1 W. CAPITAL AVENUE INDIANAPOLIS, IN_46240

192 900116 MISHAWAKA CITY SCHOOLS 1402 5. HAIN MISHAVARA, IT_46544

195 900116 MIERS SEPTIC SERVICE ROBTE 3 LISONIER, IN_46767

198 900116 NATIONAL MEAT TREATING CORP. 1621 S. HONROR FORT WAYNE, IN_46803

201 900116 MIPSCO SUNSVA NAMHCH 2822 HAMMOND, IN_46320

181 900116 D.T. CARLTON HAGNAVOR GOV. 6 INDUSTRIAL 1313 PRODUCTION ROAD

ELECTRONICS COMPANY

PORT WAYNE, IN_46608

184 900116 STEPHEN T. BENIS ASSISTANT CORPORATE COUNSEL 21001 VAN BORN ROAD MASOD INDUSTRIES. INC. TATLOR, NY_48160

187 900116 NCDOWELL ENTERPRISES, INC. JARES W. WOODSHALL, ESQ. 121 W. PRANKLIN STREET, STE 400 WARRICK, WEAVER, 5 BOTH PLRMART, IW_46516

900116 190 BREK HACE. INC. 6529 HAPLEDOURS DRIVE FORT WATUE, IN_46615

193 900116 BORSANTO 910 GERBER STREET LIGONIER, IN_46767

196 900116 BAAS FOOD BURAL BOUTE 5 PORTLAND, IN_47371

199 900116 WORPOLE 6 WESTERN RAILYWAY CO. 6111 WELSON ROAD PORT WATHE, [#_46803

900116 202 MORTHERN INDIANA PUBLIC SRVS. CO 5265 NOLHMAN AVENUE HARMOND, IN_46320

205 900116 SOUTH BEND, IN_46624

179 900116 RCITARCANCE REMIJOR HILES C. GERBERDING P.O. BOX 2263 BARRETT, BARRETT & MCHAGNY PORT WATHE, IN_46801

132 900116 MAPLEWOOD SHELL SERVICE 6132 STELLHORN ROAD FORT WATER, IN_46815

135 900116 HATBRIALS HANDLING EQUIPMENT CORP 7433 US MIGHWAY 30 C. FORT WATHE, IN_46803

138 900116 W.A. AILES VICE PRESIDENT-TREASURER 909 W. LAPAYETTE STREET MCGILL MANUFACTURING CO. INC. VALPARAISO, IN_46383 <

900116 191 METALLURGICAL PROCESSING, INC. 3715 E. WASHINGTON BOULEVARD P.O. BOX 10842 FORT WATME_IN 46854-0842

194 900116 BOORE BUSINESS FORMS WEST MILL ANGOLA, IN_46703

197 900116 R.M. RIVETNA, MANAGER ENVIRONMENTAL ENGINEERING 8101 WEST MISSIMS ROAD NATIONAL CAN CORP. CHICAGO, IN_60631

202116 NORTH AMERICAN VAN LINES, INC. 5001 U.S. HIGHWAY 30 W. FORT WAYNE, IN_46418

933116 O.E.C. MEDITAL SYSTEMS

204 900116 ONTARIO PORGE CORPORATION

ORTON-MCCULLOUGH CRANE

onto	uro Fage	م	reposition
1200	WEST JAC	KSON	STREET
P.O.	BOX 2757		
MUNCI	TE. IN 473	03	

207 900116 PHD CO. 4763 N. U.S. 24 E. HUNTINGTON,IN_46750-9617

210 900116
POORMAN'S MEATING AND AIR
CONDITIONAING SERVICE, INC.
1417 MARTIN
FORTY WATNE, IN_46802

213 900116
R.J. RIMA, SUPERVISOR
ENVIRONMENTAL APPAIRS
P.O. BOX 1346
PANNANDLE BASTERN PIPELINE CO.
KANSAS CITY, NO_64141

216 900116
HONICA H. PONRHAW, SR. ATTORNEY
R.R. DOWNELLEY 6 SONS
2223 HARTIN LUTRER KING DRIVE
CHICAGO,IL_60616

219 900116 RENCO OIL P.O. BOX 610 HISHAWARA, IM_46544

222 900116
ROPPE RUBBER CORP.
101 INDUSTRIAL DRIVE
ANGOLA, IN_46703~1045

225 900116 SEANCO 503 E. BROAD SOUTH WHITLET, IN_46787

'228 900116 SHELL CAR WASH 1001 W. 7TH AUBURN, IN_46706 OFTON- McCullungh Crane
P.O. BOX 846
HISHAWAKA, IN_46544

20A 700116
DAIME W. SKINMER
ASSISTANT RISK HANAGER
P.O. BOY 993
PHILLIPS INDUSTRIES, INC.
DAYTON, ON 45401

211 900116
POWER PLANT SERVICE, INC.
2010 LAREVIEW ROAD
PORT WAYNE, IN_46808-3922

214 900116
ROWALD R. RICHEY
PRECISION PLASTICS, INC.
P.O. BOX 329
COLUMBIA CITY, IN_86725

217 900116 RACO, INC. NARVET NOSSELL, INC. P.O. BOI 4002 MISHAWAKA, IN_46755

220 900116 REBSBERGER OIL 1604 ROPEL SOUTH BEND, IN_46628

223 900116 SYDER TRUCK RESTAL PORT WAYNE LEASING P.O. BOX 419 PORT WAYNE, IN_46801

226 900116 SHAMBAN 6 CO., INC. 2531 BRENER DRIVE PORT WAYNE, IN_46803

229 900116 SHELLER GLOBE P.O. BOX 962 TOLEDO, OH_43697 aec Medical Systems
501 ARISHUR POAD
WARSHU, IN_46580

OTTO STATE S

209 900116
PLYNOUTH COMMUNITY SCHOOLS
701 EAST BERKELET STREET
PLYNOUTH, IN_46561

212 900116 PRATRIE VIEW LANDFILL P.O. BOX 128 WYATT, IN_46595

215 900116 PRINCO, INC. P.O. BOI 9782 FORT WATHE, IN_46899 \

218 900116 RECLAINER, INC. P.O. BOX 610 HISHAWARA, IN_46755

221 900116
ROCKUPLL INTERNATIONAL
1001 W. CULVER ROAD
KNOR, IN_46534

224 900116
REDER PRUCK RENTAL 5 LEASING
DISTRICT OPPICE
5225 NEW HAVEN AVENUE
PORT WARNE, IN_46803

227 990116 SHANE & HIAIT MARAIMON P.O. BOK 125 SWATEEE, IN_46986 231 900116 SHOAPP PARK BAPTIST CHURCH 6651 ST. JOB ROAD FORT WAYNE, IN_46615

234 900116
SIBLET HACHINE & FOUNDRY CORP.
206 EAST TUTT STREET
P.O. BOX 40
SOUTH BEND, IN_46624

237 900116 STANADYNE, INC. SIDNEY HARGOUS, ESQ. 1 PIRST WATIOWAL PLANA, STR. 5000 WINSTON AND STRAWS CHICAGO, IL 60603

240 900116 STOUTCO, INC. 1 STOUTCO DRIVE P.O. BOX 307 BRISTOL, IN_46507-0307

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243 900116 SUPERIOR CO., INC. 1610 CALHOUN STREET FORT WAYNE, IN_46000-2400

246 900116 SUPREME CORP. 16500 COUNTY ROAD 28 P.O. BOI 463 GOSHEN, IN_46526-9354

249 900116 TTP, IEC. ROUTE 8 P.O. BOX 317 WARSAW, IM_46880

252 900116 U.S. AVIEX CO. P.O. BOX 340 1800 TERNIHAL ROAD MILES, HI_49120

255 900116
UNITED STATES POST OFFICE
424 SOUTH MICHIGAN
SOUTH BEND, IN_46601

232 900116 STRPPRN'S JOHN DEERE SALES & SERVICE P.O. BOX 294 BLUPPTON, IN_46714

235 900116 SIRERMAN CONSTRUCTION 5720 NUGUENERD ROAD PORT WAYNE, IN_46618

230 900116 STRPPRH WILLIAM & SON IMPLEMENTATION SHOP 657 U. NAIW BLUPPTON, IN_46714

241 900116 STRAUSS, INC. 22 8. MAIN STREET NORTH MANCRESTER, IN \$6060

249 900116 superior lineage 2110 squart mpu gardo, in_46769

287 900116
RUSSELL H. SUSAG, PRD., P.E.
PIR, EMVIROUMENTAL REGULATORY
P.O. POZ 33331
AFFACES
ST.: PAGL, ME_55133

250 900116
VIC TRIPPEL PLUMBING, HEATING, AIR COMPITIONING, INC.
595 8: 3 HISHAVARA
RISHAWARA, IN_46545

253 900116 UNIROTAL PLASTICS CO., INC. 312 N. HILL STREET P.O. BOY 2000 HISHAWAKA, IN_46544-1320

256 900116
UNIVERSAL TOOL 6 STAMPING CO.
GRANT VAN HORNE
P.O. BOX 523
AUBURN, IN_46706

230 900116 SHERREL'S ALL STAR DAIRY, INC. 1019 PLAYHILL DACA WILL WCTDRITHUM

233 900116 SHALL PARTS, INC. P.O. BOK 23 LOGARSPORT, IN_46947

236 900116 SOUTH BEND LATHE 400 W. SAMPLE STREET SOUTH BEND, IN_46625

239 900116 SUPERIOR WASTE STSTEMS C/O ROGER ZEHNTER JOACH DADITERPITATION SULL THEMPSEER STEEN ACCES BROOK, IL_60521

242 900116 SUN OIL COMPANY P.O. BOX 30 NUMTINGTON, IN_46750

245 900116 SUPERIOR WASTE SYSTEMS 54107 BUTTERNUT ROAD SOUTH BRWD, IM_46628

248 900116 STRDICATE SALES, INC. 801 W. MORGAN KOKONO, IN_46901-2055

251 900116 USA 1 - ENTERPRISES, INC. 2501 LWW MISHAWAKA, IN_46544

254 907116 UNITED STATES GYPSUN CO. 3501 CANAL STREET EAST CHICAGO, (N_46312 258 900116
VITREOUS STEEL
900 E. WABASH AVENUE
HAPPANEE, IN_46550

261 900116
WABASH FIBRE BOX CO.
WESTON PAPER AND HFG. CO.
PERGUSON ROAD, BAER FIELD
PORT WATNE, IN_46809

264 900116 JAN WATERS 6 ROGERS 7603 NELSO ROAD PORT WAYNE, IN_46803

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267 900116
WATHE RETAL PROTECTION CO.
1511 WARREN AVENUE
PORT WATHE, IN_46003-2146

270 900116 WOODALL 10261 S. INDIAN LAKE BOULEVARD INDIANAPOLIS, IN_46236 259 900116 VOLCRAPT COUNTY ROAD 60 ST. JOE, IN_46765

262 900116 WABASH, INC. 411 & SOUTH BURTINGTON, IN_

265 900116 JOR WATKINS RURAL ROUTE 4 PORT WATME, IN_46819

268 900116
WATHE RECLAMATION & RECYCLING INC
LARRY BROCKHAW
P.D. BOX 467
DANIEL DRIVE
COLUMNIA CITY, IN_46725

271 900116
WORLD COLOR PRESS
CHENICAL PLATE CORP.
P.O. BOX 1248
EPPINGRAM, IL_62401

257 900116 VALLEY MACHINE PRODUCTS 1840 BORNEHAN AVENUE ELKHART, IN_46517

250 900116
WABASH ALLOYS, INC.
DIVISION OF OGDEN CORP.
P.O. BOX 466
OLD U.S. 24 M.
WABASH,IN_46992-0466

263 900116 WALERRO TOOL 1935 W. LUSHER ELKHART, IM_46517

266 900116
WATHE HOME EQUIPMENT
DIVISION OF SCOTT S PETZER
801 GLASGON AVENUE
PORT WATHE, IN_46803-1344

269 900116 WHIPLEY PRODUCTS 1403 STRALEY DRIVE PLYNOTH, IN_46563

272 900116 FOLDS CORPORATION 6932 SETTESBURG PIKE FORT WATHE, IN_46804

ATTACHMENT III

PROPOSED PLAN

WAYNE RECLAMATION AND RECYCLING SITE COLUMBIA CITY, INDIANA

WAYNE RECLAMATION AND RECYCLING PROPOSED PLAN COLUMBIA CITY, INDIANA

INTRODUCTION

This Proposed Plan identifies the preferred option for cleaning up the contamination at the Wayne Reclamation and Recycling (WRR) site. In addition, the Plan includes summaries of other alternatives analyzed for this site. This document is issued by the U.S. Environmental Protection Agency (U.S. EPA), the lead agency for the site activities, and the Indiana Department of Environmental Management (IDEM), the support agency for this response action. U.S. EPA, in consultation with the IDEM, will select a final remedy for the site only after the public comment period has ended and the information submitted during this time has been reviewed and considered.

U.S. EPA is issuing this Proposed Plan as part of its public participation responsibilities under Section 117(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). This document summaries information that can be found in greater detail in the Remedial Investigation (RI) and Feasibility Study (FS) reports and other documents contained in the administrative record file for this site. U.S. EPA and the State encourage the public to review these other documents in order to gain a more comprehensive understanding of the site and Superfund activities that have been conducted there. The administrative record file, which contains the information upon which the selection of the response action will be based, is available at the following locations:

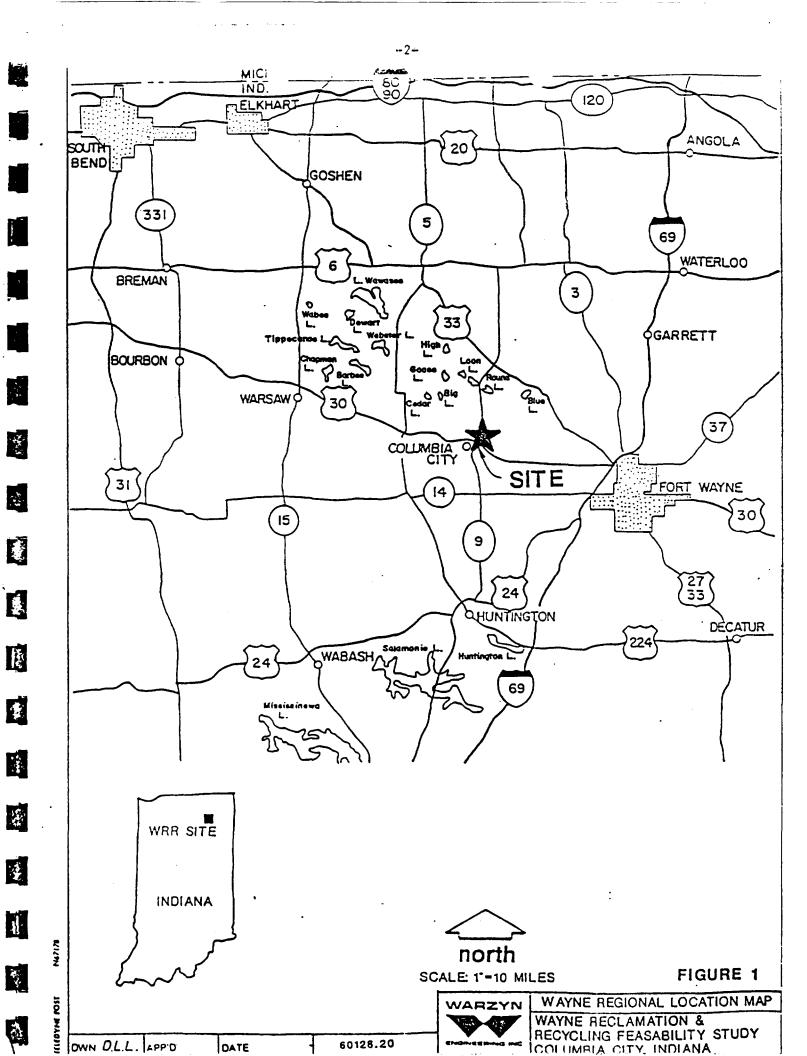
Peabody Library 203 N. Main Street Columbia City, Indiana 46725 Columbia City Hall 211 S. Chauncey Street Columbia City, Indiana 46725.

U.S. EPA, in consultation with the IDEM, may modify the preferred alternative or select another response action presented in the Plan and the RI/FS Reports based on new information or public comments. Therefore, the public is encouraged to review and comment on all the alternatives identified here.

SITE BACKGROUND

Site History

WRR is an approximately 30 acre site, located on the southeast edge of the Columbia City limits (Figure 1). It is bounded on the south and east by the Blue River and on the west and northwest by a cemetery and residential area. The site includes approximately 20 acres currently owned by WRR, 6 acres in the north which WRR sold to Holmes & Company in 1982, and 4 acres on the west owned by Columbia City.



In 1975, WRR purchased approximately 25 acres of land on the southeast edge of Columbia City, including a 13.6 acre portion that Columbia City owned since 1953. WRR and its division, Wayne Waste Oil, began operating an oil reclamation business at the site in 1975. In 1980, the Indiana State Board of Health (ISBH) began investigating the WRR site as a result of reports from a former WRR employee that hazardous wastes were being illegally disposed of at the site. ISBH determined that between February 1979 and May 1980, WRR filed hauler reports stating that it had disposed of 250,000 gallons of sludge at the Williams County landfill in Bryan, Ohio. However, the landfill had not received any waste shipments from WRR during that time.

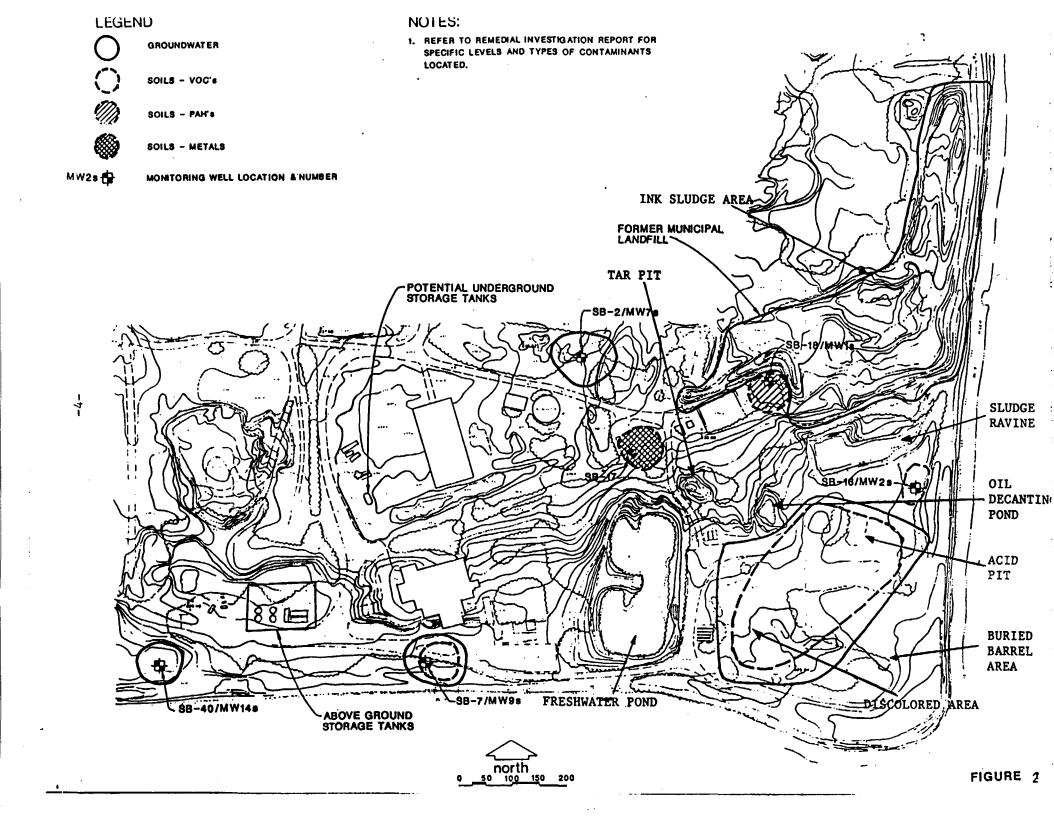
In 1982, WRR and one of its principals, Wayne Brockman, pleaded guilty to illegal "depositing of contaminants" and filing false hauler reports. They were required to pay a fine, to fund a risk assessment of the site, and to pay for cleanup. WRR did not perform the cleanup required under its guilty plea.

The site (Figure 2) can be divided into three major areas: the southeast portion designated as the lower floodplain; the northeast portion designated as an old City landfill area; and the central and west portion, known as the uplands. The lower floodplain includes the areas which have been identified as the "freshwater pond", "oil decanting pit", "tar pit", "sludge ravine", "discolored area", "buried barrel area" and "acid pit". The old City landfill which Columbia City operated from 1953 to 1970, is in the northeast part of the site. Also included in this area is the "ink sludge area". The upland area includes the now inactive WRR office buildings and numerous tanks.

In December, 1982, the WRR site was listed on the National Priorities List (NPL). On July 10, 1986, approximately 100 Potentially Responsible Parties (PRPs) entered into an Administrative Order by Consent with U.S. EPA to conduct a removal action at the site. Because the removal was not satisfactorily completed, a Unilateral Administrative Order was issued to a smaller group of PRPs on February 17, 1988, requiring them to complete a removal action.

On August 14, 1987, U.S. EPA entered into an Administrative Order by Consent with over 100 PRPs to conduct the RI/FS. The U.S. EPA and IDEM oversaw all facets of the investigations. The RI was conducted to determine the nature and extent of contamination and the FS evaluated the alternatives to prevent migration of the contaminants. Results of the RI, which was finalized in June, 1989, are as follows:

o Surface soils in the area of the shooting range (SB-18) are contaminated with polynuclear aromatic hydrocarbons (PAHs).



- o The highest levels of volatile organic soil contamination were detected in the southwest area of the site along the Blue River (SB-7/MW9 and SB-40/MW14S); in the northern portion of the site west of the old City Landfill; and the southeast corner of the site. The major contaminants are chlorinated ethenes and to a lesser extent, chlorinated ethanes, toluene and alkanes.
- o The majority of groundwater contamination is caused by chlorinated ethanes and occurs in the same general location as the volatile organic soil contamination.
- o Magnesium, cadmium, copper, zinc, and lead were detected at levels above the ranges considered to be common in "natural soils." In general, the elevated levels of these compounds coincided with the areas described above for the volatile organic compounds. However, one apparently isolated area of considerably high concentrations of these elements (particularly lead) was detected approximately midway between the "freshwater pond" and the northern boundary of the site (SB-17/SB-17A). In addition, investigations in 1987, by the Technical Assistance Team (TAT) and the Environmental Response Team (ERT) found elevated levels of lead in the contents of four vertical and three horizontal tanks, located just west of the WRR office, and in the surrounding soils.
- concentrations of inorganic parameters in surface water and sediments from the Blue River adjacent to the site were not significantly above those upstream from the site boundary, with the possible exception of copper and zinc in sediments. A slight increase in cyanide concentrations was observed adjacent to the site as compared to upstream concentrations. Concentrations of inorganic parameters (particularly cyanide) in on-site surface waters were elevated in the wetland north of the site, "sludge ravine", and "oil decanting pit." Volatile organic compounds in on-site sediments were elevated in the three surface water locations previously mentioned, as well as in the "freshwater pond."
- o Although this was not discussed in the RI, the old City Landfill lacks appropriate cover to ensure compliance with RCRA Subtitle D regulations.

Scope and Role of the Response Action

The PRPs, under the direction of the U.S. EPA have already initiated two removal response actions at this site. Removal activities under the 1986 Administrative Order by Consent included excavation and disposal of contaminated soil in the "oil decanting pit", "tar pit" and "sludge ravine"; removal and disposal of the contents of 215 55-gallon drums and soil from the

"buried barrel area" and backfill. Backfilling remains to be done in the "oil decanting pit", "tar pit" and "sludge ravine". Removal activities under the 1988 Unilateral Administrative Order included excavation and disposal of contaminated soil from the "discolored area", "acid pit", "ink sludge area" and "sludge ravine"; removal and disposal of an additional 125 drums; removal and disposal of the contents of 23 horizontal tanks; fencing of the "oil decanting pit", "sludge ravine", and "discolored area"; and backfilling the "acid pit" and "ink sludge area" with off-site borrow.

This Proposed Plan addresses contaminated soil and groundwater in the lower floodplain and upland areas of the site; RCRA Subtitle D closure requirements for the old Columbia City landfill; and empty/clean/removal of the remaining tanks and debris which pose a threat to human health and the environment. These areas were determined to be a principal threat at the site because of the potential threat of direct contact with the soils and the soil's impact on the groundwater. The contaminated groundwater is a principal threat at the site because of the potential for direct ingestion of contaminants through municipal and private drinking water wells. This is the third and final response action for this site.

Summary of Site Risks

During the RI, an analysis was conducted to estimate the health or environmental problems that could result if the contamination at the WRR site was not cleaned up. This analysis is commonly referred to as a baseline Endangerment Assessment (Chapter 6 of the RI Report). In conducting this assessment, the focus was on the health effects that could result from direct exposure to the contaminants as a result of the soil coming into contact with the skin, or from direct ingestion of the soil. The Endangerment Assessment also focused on the health effects that could result from ingestion, inhalation, or direct contact with the skin of contaminated groundwater from a municipal or drinking water well.

Groundwater

The major contaminants of concern in the groundwater were Trichloroethylene (TCE) and vinyl chloride. TCE and vinyl chloride are volatile organic compounds that are known to cause cancer in laboratory animals and are therefore classified as carcinogens. TCE is a highly mobile contaminants that typically migrates through the soil into the groundwater.

The average concentrations of TCE and vinyl chloride found in the groundwater beneath the WRR site resulted in an excess lifetime cancer risk of 2 x 10^{-4} . This means that if no cleanup action is taken by U.S. EPA, two additional people per ten thousand have a chance of contracting cancer as a result of the exposure to

groundwater contaminated with TCE and vinyl chloride.

Soil

The major contaminants of concern in the soils were polynuclear aromatic hydrocarbons (PAHs) and Polychlorinated biphenyls (PCBs). PAHs and PCBs are also classified as carcinogens. PAHs tend to be relatively immobile contaminants that will typically remain in the soil for long periods of time.

Sampling of the on-site soil found that average concentrations of PAHs resulted in an excess lifetime cancer risk of 3 x 10^{-2} . This means that if no cleanup action is taken by U.S. EPA, three additional people per one hundred have a chance of contracting cancer as a result of the exposure to the PAH-contaminated soil.

These estimates were developed by taking into account various conservative assumptions about the likelihood of a person being exposed to the soil and groundwater and the toxicity of the contaminants.

Actual or threatened releases of hazardous substances from this site, if not addressed by the preferred alternative or one of the other active measures considered, may present an imminent and substantial endangerment to public health, welfare, or the environment.

SUMMARY OF ALTERNATIVES

Based on the findings in the RI report, the following remedial action objectives were established for the WRR site to ensure protection of human health and the environment:

Groundwater

- o Minimize potential future risk to public health from consumption of contaminated groundwater.
- o Control migration of contaminated groundwater to the Blue River water and sediment.
- o Reduce migration of subsurface soil contaminants to the groundwater

Contaminated Soil

- o Minimize risk to public health and environment from the direct contact with PCB and PAH contaminated surface soil.
- o Reduce potential for erosion and transport of contaminated surface and subsurface soil to the Blue River.

Municipal Landfill

o Ensure adequate cover is present to prevent erosion and exposure of waste resulting in direct contact or washout to the river.

Surface and Subsurface Tanks and Contents

o Eliminate potential migration of tank contents to surface and subsurface soil and groundwater.

Common Elements

There are seven remedial action alternatives which have been developed to address the contamination at the WRR site. Except for the "No Action" alternative, all of the alternatives now being considered for the site would include a number of common components. Alternatives 2 through 7 include removal and/or treatment of the tank contents and capping of the municipal landfill in accordance with RCRA Subtitle D sanitary landfill closure requirements. Soil and groundwater in the vicinity of the tanks may require additional investigation to delineate the extent of contamination due to spills or leaks associated with the tanks. It is assumed that additional soil or groundwater contamination could be addressed in a similar manner used in other areas of the site.

A large amount of debris is scattered throughout the site. These materials should be evaluated and those determined to be solid waste can be consolidated and placed under the municipal landfill cap. Those materials determined to be contaminated with hazardous waste would need to be cleaned or disposed in accordance with RCRA.

Each alternative also includes groundwater extraction and treatment to health-based levels and MCLs. Long-term groundwater monitoring in compliance with requirements of RCRA Subpart F, 40 CFR Section 264.100 will be conducted to gauge the effectiveness of the selected remedy. In addition, erosion control provisions and deed restrictions are required. It should also be noted that the wastes at the WRR site were found to be sufficiently similar to RCRA-listed waste or RCRA-characteristic wastes to make RCRA relevant and appropriate.

Lead-contaminated soil was found in the vicinity of SB-17 and SB-17A. Although this contamination appears to be localized, the extent of remediation of this area will be determined based on additional sampling during the remedial design. Remediation of the lead-contaminated soil will be achieved by either soil washing or immobilization technologies.

A more detailed discussion of the remedial action alternatives is presented below. Costs, including annual operation and maintenance (O&M), for each alternative are also provided. All costs and implementation times are estimated.

Alternative 1: NO ACTION

Capital Cost: \$0
Annual O&M Cost: \$0
Present Worth: \$0
Time to Implement: None

The Superfund program requires that the "no action" alternative be evaluated at every site to establish a baseline for comparison. Under this alternative, U.S. EPA would taken no further action at the site to prevent exposure to the soil and groundwater contamination.

Alternative 2: GROUNDWATER EXTRACTION AND AIR STRIPPING/ COVERING PAH-CONTAMINATED SOILS/ CAPPING VOC-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,329,630
Annual O&M Cost: \$ 228,500
Present Worth: \$5,483,700
Time to Implement: 30 years

Given the presence of the municipal well field immediately north of the site, vertical hydraulic gradients are downward from the upper to lower aquifers when the municipal well is being used. Therefore, the groundwater extraction system would be designed to lower the water table approximately 3.5 feet so that groundwater gradients are upward even when the municipal wells are pumping. The extraction wells in the southeast area of the site would be located within a slurry wall in order to allow for lower extraction rates and to facilitate lowering of the groundwater table. Additional groundwater extraction wells would also be placed through the site in order to intercept all contaminated groundwater. Treated groundwater would be discharged to the Blue River. Discharge limits would be established in accordance with IDEM's NPDES program.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. VOC-contaminated soil will be capped in accordance with RCRA Subtitle C closure requirements to prevent the incidence of dermal contact and reduce contaminant migration to the groundwater via infiltration.

In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 3: GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL FLUSHING WITH TREATED GROUNDWATER/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,248,230
Annual O&M Cost: \$ 236,700
Present Worth: \$5,110,848
Time to Implement: 15 years

The groundwater extraction and treatment system would be identical to the system described for Alternative 2. However, to reduce the time that the system will need to operate, the treated effluent will be flushed through the areas of the site with VOC-contaminated soils. A treatability study will be required to determine the process effectiveness and necessity for adding surfactants to the flushing fluid for aid in contaminant removal. Contaminants are recovered by the groundwater extraction system and treated. The soil flushing has the effect of accelerating the natural process of soil flushing that would occur through rainfall infiltration. It is estimated that the flushing system would operate for a period of 15 years.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 4: GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL VAPOR EXTRACTION/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,306,875
Annual O&M Cost: \$ 291,000
Present Worth: \$5,582,499
Time to Implement: 15 years

To reduce the time required to operate the groundwater extraction and treatment system presented in Alternative 2, a soil vapor extraction (SVE) system would be used to remove the VOC contamination from the soil. The vapor extraction wells would be placed in the areas of the site with VOC-contaminated soils. The area surrounding the vapor extraction wells would be covered with approximately three feet of fill to increase the efficiency of the system by reducing the volume of air being pulled from above the ground surface. The air emissions will be treated to health-based levels. The SVE and groundwater extraction systems will operate in conjunction for approximately 15 years to meet the clean-up criteria.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 5: GROUNDWATER EXTRACTION AND AIR STRIPPING/ EXCAVATION AND BIOLOGICAL TREATMENT OF VOC-CONTAMINATED SOIL/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$7,988,170
Annual O&M Cost: \$ 279,000
Present Worth: \$9,927,114
Time to Implement: 15 years

To reduce the operating time for the groundwater extraction and treatment system presented in Alternative 2, approximately 30,000 cubic yards of VOC-contaminated soils would be excavated and biologically treated on-site. Microorganisms, nutrients, and oxygen would be supplied to the contaminated soils to promote transformation and aerobic biological degradation of the VOC contaminants. The area available to construct the treatment facility is not large enough to accommodate all of the contaminated soil at one time. Therefore, the excavation, treatment and backfilling operations would need to be staged. It is estimated that soil treatment would take two to four years.

Since this alternative involves the excavation and placement of waste, the RCRA Land Disposal Restrictions (LDR) would be invoked. Therefore, the cost estimate assumes a minimum technology disposal unit would be constructed prior to redisposal of the excavated and treated soil.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 6: GROUNDWATER EXTRACTION AND AIR STRIPPING/ EXCAVATION AND ON-SITE INCINERATION OF VOC- AND PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$ 9,805,845
Annual O&M Cost: \$ 228,500
Present Worth: \$11,322,222
Time to Implement: 10 years

To minimize the operating time of the groundwater extraction and treatment system presented in Alternative 2, the VOC- and PAH-

contaminated soils would be excavated and incinerated on-site. Approximately 30,000 cubic yards of contaminated soil would be incinerated on-site using a mobile infrared unit. Based on an average process rate of 14,000 lb/hr, the incineration process would be completed in approximately nine to twelve months. It is estimated that the groundwater extraction system would operate for approximately ten years.

For costing purposes, it is assumed that the incinerator ash would not be a RCRA hazardous waste and could be backfilled onsite. Confirmatory sampling would be required prior to disposal. Waste sludge from the incinerator air scrubbers would, however, be considered hazardous and would thus require disposal at an approved RCRA facility.

In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 7: GROUNDWATER EXTRACTION AND DISCHARGE TO THE POTW/COVERING PAH-CONTAMINATED SOILS/CAPPING VOC-CONTAMINATED SOILS/EROSION CONTROLS/DEED RESTRICTIONS/MONITORING/CAPPING MUNICIPAL LANDFILL/REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,571,980
Annual O&M Cost: \$ 298,500
Present Worth: \$6,385,960
Time to Implement: 30 years

This alternative is the same as Alternative 2, except that the extracted groundwater would be discharged to the POTW instead of air stripping and discharge to the Blue River. Consideration of this alternative would is based on the assumption that the Columbia City POTW is willing and able to accept the WRR site effluent. Currently the POTW does not have a pretreatment program with IDEM. The Columbia City POTW is scheduled for a capacity expansion in October 1990.

EVALUATION OF ALTERNATIVES

The preferred alternative for cleaning up the WRR site is Alternative 4 -- GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL VAPOR EXTRACTION/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS. In addition, additional investigation will be conducted in the now inactive tank area and the lead-contaminated soil area (at SB-17 and SB-17A) to determine the extent of remediation. Based on current information, this alternative would appear to provide the best balance of trade-offs among the alternatives with respect to U.S. EPA's nine evaluation criteria. This section discusses the performance of the preferred alternative

against the nine criteria, noting how it compares to the other options under consideration. A glossary of the evaluation criteria is contained in Table 1.

Analysis

Overall Protection. All of the alternatives, with the exception of the "no action" alternative, would provide adequate protection of human health and the environment by eliminating, reducing, or controlling risk through treatment or engineering controls. The preferred alternative would treat the volatile organic contaminants in the soil and groundwater, cover the PAH-contaminated soil, and cap the municipal landfill to reduce the risks associated with direct contact and ingestion of contaminated soils and/or groundwater.

Because the "no action" alternative is not protective of human health and the environment, it is not considered further in this analysis as an option for this site.

Compliance with ARARs. All alternatives would meet their respective applicable or relevant and appropriate requirements of Federal and State environmental laws. Since the preferred alternative would not involve the excavation and placement of waste, LDR would not be an ARAR. However, all options would involve the relevant and appropriate RCRA requirements.

Discharge of the treated groundwater to the Blue River would meet the State's NPDES discharge limits. No waiver from ARARs is necessary to implement any of the active cleanup options. Soil clean-up levels will be established to ensure that contaminant leaching into the groundwater will not exceed health-based levels or MCLs.

Long-term effectiveness and permanence. The preferred alternative would reduce the inherent hazards posed by the VOC-contaminated soil and groundwater through treatment. SVE would be an effective method to reduce contaminant levels in soils because the primary contaminants are VOCs. In addition, the soil cover over the PAH- and VOC-contaminated soils would eliminate the direct contact threat associated with these areas. Removal of the tank contents would eliminate the potential for additional contamination of the surrounding soil and groundwater due to leaks or spills from the tanks.

Alternative 3 would also be effective in reducing site risks. However, potential complications with soil flushing are the controls required to lower the water table to induce upward gradients from the lower aquifer, while at the same time flush soils above the water table. In addition, the heterogeneous nature of the soils in the southeast area of the site may cause the drainage gallery to backup and discharge to the surface.

TABLE 1

GLOSSARY OF THE NINE CRITERIA

Community Acceptance will be assessed in the Record of Decision following a review of the public comments received on the RI/FS report and the Proposed Plan.

Compliance with ARARs

addresses whether or not a remedy will meet all of the applicable or relevant and appropriate requirements of other environmental statutes and/or requires uses of a waiver.

Cost

includes capital and operation and maintenance costs.

Implementability

is the technical and administrative feasibility of a remedy, including the availability of goods and services needed to implement the chosen solution.

Long-term Effectiveness and Permanence refers to the ability of a remedy to maintain reliable protection of human health and the environment over time once cleanup goals have been met.

Overall
Protection of
Human Health and
the Environment

addresses whether or not a remedy provides adequate protection and describes how risks are eliminated, reduced or controlled through treatment, engineering controls, or institutional controls.

Reduction of Toxicity, Mobility, and Volume

is the anticipated performance of the treatment technologies a remedy may employ.

Short-term Effectiveness

involves the period of time needed to achieve protection and any adverse impacts on human health and the environment that may be posed during the construction and implementation period until cleanup goals are achieved.

State Acceptance indicates whether, based on its review of the RI/FS, Proposed Plan, and public comments, the State agency concurs, opposes, or has no comment on the preferred alternative.

Alternatives 5 and 6 would effectively reduce site risks through treatment; however, land disposal of the treated material or ash would require long-term O&M.

Alternatives 2 and 7 would eliminate the direct contact threat; however, the inherent hazards of the waste will remain. The municipal landfill cap and groundwater monitoring system will require long-term O&M for all alternatives. Alternatives 5 and 6 are the only alternatives that would actively treat the PAH-contaminated soil, for all other alternatives these soils would be consolidated under the municipal landfill cap.

Reduction of toxicity, mobility, or volume of the contaminants through treatment. Only four of the alternatives would treat the principal threat of VOC-contaminated soil to reduce toxicity, mobility, or volume. The preferred alternative and alternative 3 would involve treatment of the VOC-contaminated soil via SVE or soil flushing in conjunction with groundwater extraction and treatment.

Alternatives 5 and 6 would involve biological treatment or incineration that would permanently destroy the VOC and PAH contaminants. The treated soil or contaminated ash would; however, be disposed of in a RCRA landfill.

Alternatives 2 and 7 achieve no reduction in toxicity, mobility, or volume for the VOC-contaminated soils.

It should be noted that although the cap over the municipal landfill and PAH-contaminated soil does not afford a reduction in toxicity, mobility, or volume, it would significantly reduce infiltration and the production of leachate that could migrate off-site.

Short-term effectiveness. The preferred alternative and Alternative 3 would require approximately 15 years to achieve the groundwater clean-up levels. Although Alternatives 5 and 6 would achieve groundwater clean-up levels quicker, both of these alternatives require excavation which would pose some short-term risks of exposure to VOCs during the excavation process. In addition, rainfall infiltration will be immediate during the construction period. This could increase the migration of contaminants in the groundwater. Groundwater clean-up levels would not be achieved for 30 years for Alternatives 2 and 7.

Implementability. The individual technologies described for each of the alternatives are conventional and well demonstrated. However, there is some concern over the technical feasibility of Alternative 3 given the heterogeneous nature of the soils. Conversely, the preferred alternative, which involves SVE has been found to be feasible for a variety of soil conditions.

No unusual difficulties in the placement of the soil cover and municipal landfill cap are anticipated. However, given the close proximity of the PAH-contaminated soil to the municipal landfill the feasibility of constructing two caps is questionable. It may be more appropriate to just incorporate the PAH-contaminated soil under the municipal landfill cap.

Implementation of Alternative 7 would require the consent of Columbia City for use of its POTW.

Cost. The present-worth cost of the preferred alternative is \$5,582,500. The lowest-cost alternative is Alternative 3 at \$5,110,800. The highest-cost alternative is Alternative 6 at \$11,322,200. Alternatives 2, 5 and 7 have present-worth costs of \$5,483,700, \$9,927,100, and \$6,386,000, respectively.

State acceptance. The State of Indiana Department of Environmental Management supports the preferred alternative.

Community acceptance. Community acceptance of the preferred alternative will be evaluated after the public comment period ends and will be described in the Record of Decision for the site.

Summary of the Preferred Alternative

In summary, Alternative 4 would achieve substantial risk reduction through treatment of the principal threat remaining at the site (i.e., the VOC-contaminated soil, groundwater, and tank contents) and by providing safe management of other material that will remain at the site. Given its effectiveness and implementability, Alternative 4 achieves this risk reduction in a comparable or smaller timeframe and cost than the other treatment options. Therefore, the preferred alternative is believed to provide the best balance of trade-offs among alternatives with respect to the evaluation criteria. the information available at this time, U.S. EPA believes the preferred alternative would be protective of human health and the environment, would comply with ARARs, would be cost effective, and would utilize permanent solutions and alternative treatment technologies to the maximum extent practicable. Because it would treat the VOC-contaminated soil and groundwater, the remedy also would meet the statutory preference for the use of a remedy that involves treatment as a principal element.

THE COMMUNITY'S ROLE IN THE SELECTION PROCESS

U.S. EPA solicits input from the community on the cleanup methods proposed for each Superfund response action. U.S. EPA has set a public comment period from January 22, 1990 through February 21, 1990 to encourage public participation in the selection process. The comment period includes a public meeting at which U.S. EPA

and IDEM will present the FS report and the Proposed Plan, answer questions, and receive both oral and written comments.

The public meeting is scheduled for Wednesday, February 7, 1990 at 7:00 p.m. and will be held at:

Council Room, City Hall 112 South Chauncey Columbia City, Indiana

Comments will be summarized and responses provided in the Responsiveness Summary section of the Record of Decision (ROD). The ROD is the document that presents U.S. EPA's final selection for cleanup. The public can send written comments to or obtain further information from:

Tinka G. Hyde
Remedial Project Manager
U.S. EPA - 5HS-11
230 South Dearborn Street
Chicago, Illinois 60604
(312) 886-9296

Toll free (800) 621-8431 between 9:00 a.m. and 4:30 p.m. Central Time

U.S. EPA and IDEM are soliciting public comments about the most acceptable way to clean up the Wayne Reclamation and Recycling site. The Proposed Plan and the RI/FS Reports have been placed in the Information Repositories and Administrative Record for the site. The Administrative Record includes all documents such as work plans, data analyses, public comments, transcripts and other relevant material used in developing the remedial alternatives for the Wayne Reclamation and Recycling site. These documents are available for public review and copying at the following locations:

City Hall 112 South Chauncey Columbia City, IN Peabody Library 203 North Main Columbia City, IN.

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